

EXHIBIT B



Outlook

Re: Uber JCCP / MDL Production Dates for discussion

From Roopal Luhana <Luhana@chaffinluhana.com>

Date Tue 10/1/2024 12:02 PM

To Michael Shortnacy <mshortnacy@shb.com>

Cc Beth Wilkins <Wilkins@chaffinluhana.com>; Patrick L. Oot <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>

Michael, we would like the parameters below included in the stipulation and they're required for us to agree to the extension. Additionally, the time line for privilege logs in the Deposition Protocol didn't contemplate the thousands of entries we've received and therefore need an expedited timeline for custodial files and privilege logs.

We look forward to receiving your draft of the Stipulation shortly.

Best,
Roopal

Roopal Luhana | Partner

E: Luhana@chaffinluhana.com

P: (347) 269-4461

Serving clients nationwide with offices in CT, NY, PA, and WV.



ChaffinLuhana.com
ChaffinLuhanaFoundation.org

**Mailing Address:**

Chaffin Luhana LLP 600 Third Ave., 12th Flr. New York, NY 10016

A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

CONFIDENTIALITY NOTE: This E-mail message contains information belonging to Chaffin Luhana LLP and may be privileged, confidential and/or protected from disclosure. The information is intended only for the use of the individual or entity named above. If you think that you have received this message in error, please E-mail the sender. If you are not the intended recipient, please delete the message and understand that any dissemination, distribution or copying is strictly prohibited.

On Oct 1, 2024, at 11:47 AM, Shortnacy, Michael (SHB) <mshortnacy@shb.com> wrote:

Roopal & team,

Thank you for your cooperation on this. We appreciate being able to work through this scheduling matter with your side in a cooperative manner.

The parties are now in agreement on the dates. We will send over a proposed stipulation for filing with the Court today.

As you note, we understand the Freivogel and Baker dates on the chart will need to be advanced, since their depositions are now set, agreed and scheduled. We also understand that noticing and scheduling a deposition would advance other dates as well, according to the PTOs.

For the other issues: 1) we are preparing the validation materials; 2) we believe we should be at equipoise on the hyperlinks issue, and Jeremy can address if you have additional questions; 3) we are working with Tiffany on perhaps modifying some fields on the logs to provide your side with additional information (without conceding that the logs are not compliant presently); and 4) as to personnel files, we have provided job titles and dates, and will provide CV's, and are prepared to meet and confer on this further or tee the issue up quickly as we think we should not have a dispute here.

Thank you again for working through this issue.

Michael

Michael B. Shortnacy

Partner

Shook, Hardy & Bacon L.L.P.

2121 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

T: 424-324-3494 | mshortnacy@shb.com

***Please note new mailing address**

<image007.jpg>

From: Roopal Luhana <Luhana@chaffinluhana.com>

Sent: Monday, September 30, 2024 12:24 PM

To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenber.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: Re: Uber JCCP / MDL Production Dates for discussion

EXTERNAL

Michael, we generally are ok with the schedule but need Uber to agree to the terms below. Also, we see there are custodians with agreed to deposition dates, e.g., Baker and Freivogel have deposition dates of Nov.19 and Nov. 14-15, respectively but your chart reflects custodial files to be produced on 10/21 and privilege logs on 11/15. We need to expedite those productions.

- 1) Privilege logs for Custodians 21-37 be produced Dec. 9 so we can work to resolve disputes before year end;
- 2) If depositions are noticed then we need expedited production of custodial files and privilege logs; and
- 3) Uber must address validation issues, address hyperlink issues immediately, ensure priv logs comply with ESI/Priv Orders and produce complete personnel files.

Let us know your thoughts.

Best,
Roopal

Roopal Luhana | Partner

E: Luhana@chaffinluhana.com

P: (347) 269-4461

Serving clients nationwide with offices in CT, NY, PA, and WV.

[<image001.png>](#)

[ChaffinLuhana.com](#)

[ChaffinLuhanaFoundation.org](#)

[<image002.png>](#)

[<image003.png>](#)

[<image004.png>](#)

[<image005.png>](#)

Mailing Address:

Chaffin Luhana LLP 600 Third Ave., 12th Flr. New York, NY 10016

A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

CONFIDENTIALITY NOTE: This E-mail message contains information belonging to Chaffin Luhana LLP and may be privileged, confidential and/or protected from disclosure. The information is intended only for the use of the individual or entity named above. If you think that you have received this message in error, please E-mail the sender. If you are not the intended recipient, please delete the message and understand that any dissemination, distribution or copying is strictly prohibited.

From: Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Sent: Monday, September 30, 2024 2:08 PM

To: Roopal Luhana <Luhana@chaffinluhana.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>

Subject: RE: Uber JCCP / MDL Production Dates for discussion

Roopal and team, we wanted to check back with you on this proposal. We are available to hop on a short call if it is easier to discuss. Thank you, Michael

From: Shortnacy, Michael (SHB)

Sent: Friday, September 27, 2024 8:40 PM

To: Roopal Luhana <Luhana@chaffinluhana.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>

Subject: RE: Uber JCCP / MDL Production Dates for discussion

Roopal, Beth, Brian & team,

Following our further meet and confer this afternoon, we have a further proposal on the remaining custodial production dates. The dates are tracked in a new column with a yellow header. Note that the deposition dates listed are the placeholder dates originally set, and no longer current. So you can disregard those dates.

Appreciate your cooperation on this.

Michael

Michael B. Shortnacy

Partner

Shook, Hardy & Bacon L.L.P.

2121 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

T: 424-324-3494 | mshortnacy@shb.com

***Please note new mailing address**

<[image008.jpg](#)>

From: Roopal Luhana <Luhana@chaffinluhana.com>

Sent: Monday, September 23, 2024 4:46 PM

To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>; Randy Luskey <rluskey@paulweiss.com>; Brian Abramson <babramson@whlaw.com>

Subject: Re: Uber JCCP / MDL Production Dates for discussion

EXTERNAL

Great, thanks. Copying Brian.

On Sep 23, 2024, at 7:16 PM, Shortnacy, Michael (SHB)
<mshortnacy@shb.com> wrote:

+ Randy. Thanks, Roopal. Tomorrow at 4 pm ET works for us. I will send an invitation to this group. Did you also invite Brian A.? Michael

From: Roopal Luhana <Luhana@chaffinluhana.com>
Sent: Monday, September 23, 2024 7:09 AM
To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Beth Wilkins <Wilkins@chaffinluhana.com>
Cc: Oot, Patrick L. (SHB) <OOT@shb.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Roopal Luhana <Luhana@chaffinluhana.com>
Subject: Re: Uber JCCP / MDL Production Dates for discussion

EXTERNAL

Thank you for the e-mail Michael. We'd had a chance to discuss and would like to schedule a call. Let us know if tomorrow between 2:30-4:30pm ET works for you to chat. Thanks.

Best,
Roopal

Roopal Luhana | Partner

E: Luhana@chaffinluhana.com

P: [\(347\) 269-4461](tel:(347)269-4461)

Serving clients nationwide with offices in CT, NY, PA, and WV.

<[image001.png](#)>

[ChaffinLuhana.com](#)

[ChaffinLuhanaFoundation.org](#)

<[image002.png](#)>

<[image003.png](#)>

<[image004.png](#)>

<[image005.png](#)>

Mailing Address:

Chaffin Luhana LLP 600 Third Ave., 12th Flr. New York, NY 10016

A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

CONFIDENTIALITY NOTE: This E-mail message contains information belonging to Chaffin Luhana LLP and may be privileged, confidential and/or protected from

disclosure. The information is intended only for the use of the individual or entity named above. If you think that you have received this message in error, please E-mail the sender. If you are not the intended recipient, please delete the message and understand that any dissemination, distribution or copying is strictly prohibited.

From: Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Sent: Thursday, September 19, 2024 11:57 AM
To: Roopal Luhana <Luhana@chaffinluhana.com>; Beth Wilkins <Wilkins@chaffinluhana.com>
Cc: Oot, Patrick L. (SHB) <OOT@shb.com>
Subject: Uber JCCP / MDL Production Dates for discussion

Roopal & Beth,

Thank you for your time today.

As we discussed, attached are Uber's proposed dates that would vary slightly from the Court's most recent scheduling Order and allow for alignment between JCCP and MDL. We believe these dates are going to be difficult to hit, but we are prepared to hit them and think they are possible. The dates set by the Court, however, are not possible, and we would like to work with your side to avoid motion practice to modify the Order (with declarations and evidentiary support from Uber on why October 1 is not feasible, or possible, etc.) Happy to get back on the phone to discuss further, after your side has had a chance to consider.

Michael

Michael B. Shortnacy

Partner

Shook, Hardy & Bacon L.L.P.

2121 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

T: 424-324-3494 | mshortnacy@shb.com

***Please note new mailing address**

<[image006.jpg](#)>

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Thank you.